



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

PUBLIC HEARING NOTICE

October 22, 2018

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **PUBLIC HEARING: PROPOSED AMENDMENTS TO REGULATION 6, RULE 5: PARTICULATE MATTER FROM REFINERY FLUIDIZED CATALYTIC CRACKING UNITS; PROPOSED AMENDMENTS TO REGULATION 11, RULE 10: HEXAVALENT CHROMIUM EMISSIONS FROM ALL COOLING TOWERS AND TOTAL HYDROCARBON EMISSIONS FROM PETROLEUM REFINERY COOLING TOWERS; PROPOSED AMENDMENTS TO REGULATION 12, RULE 15: PETROLEUM REFINING EMISSIONS TRACKING; AND CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

On **Wednesday, December 19, 2018**, the Board of Directors of the Bay Area Air Quality Management District will conduct a public hearing at the Air District Headquarters' Board Room, 375 Beale Street, San Francisco, California, at 9:30 a.m.

The Board will consider:

- Adoption of proposed amendments to Regulation 6, Rule 5: Particulate Matter from Refinery Fluid Catalytic Cracking Units;
- Adoption of proposed amendments to Regulation 11, Rule 10: Hexavalent Chromium Emissions from All Cooling Towers and Total Hydrocarbon Emissions from Petroleum Refinery Cooling Towers;
- Adoption of proposed amendments to Regulation 12, Rule 15: Petroleum Refining Emissions Tracking; and
- Certification of a Final Environmental Impact Report pursuant to the California Environmental Quality Act (CEQA).

Project Title:

Amendments to Refinery Rules (6-5, 11-10, 12-15)

State Clearinghouse Number: 2018082001

Project Location:

Amendments to the three Refinery rules apply within the Bay Area Air Quality Management District (“District”), which includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, and the southern portions of Solano and Sonoma counties.

Projects’ Descriptions:

Amendments to the three Refinery rules clarify exemptions, definitions, and requirements for specific sections of all three rules.

- Amendments to Rule 6-5 are simply clarifications of original intent.
- Amendments to Rule 11-10 reduce monitoring of cooling towers for hydrocarbon leaks from daily to weekly, with provisions to extend monitoring periods after proving no leaks for an extended time. Costs for daily monitoring were found to be excessive relative to the potential hydrocarbon emission reductions. Requirements for cooling tower best management practices and reporting were eliminated when found to be focused primarily on Process Safety Management and cooling water chemistry rather than leak detection.
- Amendments to Rule 12-15 established thresholds for reporting requirements for non-crude oil feedstock imports, and processes for handling and securing confidential information were clarified.

Significant Impacts: Air quality impacts will be significant because the proposed amendments to Rule 11-10 involve changing existing monitoring requirements for refinery cooling towers. The greatest impact is that potential foregone ROG emission reductions as a result of the proposed project could theoretically exceed the significance threshold of 10 tons per year. Operational ROG emissions are an ozone precursor and the Air District is not in attainment for ozone; since ROG emissions might exceed the significance threshold, the proposed amendments to Rule 11-10 may contribute to an air quality violation.

The only feasible method to reduce ROG emissions from cooling towers is more frequent monitoring and repair, but this method was concluded to not be feasible due to economic factors as per CEQA Guidelines §15364. Thus, no feasible mitigation measures have been identified that could avoid the significant impact or reduce the impact to less than significant.

Pursuant to the California Environmental Quality Act (Public Resources Code § 21000 et seq.), notice is hereby given that the Air District Board of Directors will consider certification of the Environmental Impact Report regarding the proposed

amendments to all three regulations pursuant to Public Resources Code 15206, 15087(c) and section 21080(d) and CEQA Guidelines §15088 et seq.

The Public Hearing Notice, proposed rule amendments, staff report, and draft EIR are available at the Air District headquarters, on the website at <http://www.baaqmd.gov/ruledev>, or by request. Requests for copies of the proposed amended rules, staff report, or draft EIR should be directed to Karen Fremming (kfremming@baaqmd.gov) at (415) 749-8427. Comments relating to the proposed amended rules and environmental analysis should be addressed to Victor Douglas, Bay Area Air Quality Management District, 375 Beale Street, Suite 600, San Francisco, CA 94105. Comments may also be sent by e-mail to vdouglas@baaqmd.gov. Comments on the proposed amended rules and draft EIR will be accepted from October 19, 2018 until December 7, 2018 at 5:00 p.m. Verbal comments are welcome up to the day of, and during, the Public Hearing.